



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

File
WA 2302

~~12/15/94~~

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12/14/94

DEC 15 1994

Reply to
Attn. of: HW-104

Edwin Liu
Remediation Engineer
Specialty Chemicals Division
Rhone-Poulenc, Inc.
CN7500
Cranbury, New Jersey 08512

Re: EPA Comments On Data Review of Arsenic and PAH Occurrences
Docket No. 1091-11-20-3008(h)
EPA ID No. WAD 00928 2302

Dear Edwin,

The United States Environmental Protection Agency (EPA) has received and reviewed the Draft Data Review of Arsenic and PAH Occurrences (October 19, 1994) for your Tukwila facility. Overall, we found the report to be very well done and convincing. At this time, arsenic and PAH detected at the facility do not seem to exceed the background occurrences in the area.

Enclosed are our comments which should be included in the final report and/or RFI report. If you or your representatives have any questions regarding these comments or this letter, please call me at (206) 553-1604.

Sincerely,

Tom C. Post

Tom C. Post, Compliance Officer
RCRA Compliance Section

Enclosure

cc: Byung Maeng, WDOE NWRO
Sue Hays, Hays Consulting
bc: Jack Boller

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EPA COMMENTS
DRAFT DATA REVIEW OF ARSENIC AND PAH OCCURRENCES
RHONE-POULENC TUKWILA FACILITY
DECEMBER 14, 1994

1. There appears to be a discrepancy between the number of values and detection ranges given in the text on Table 1, page 6, for the facility (related to footnote 1 (site assessment)), and the text in pages 2 and 5 (RFI data). In the table it states that soil concentration at the facility detected Arsenic in 154 of 156 samples, but Table 1 shows 23 of 252 detects. The table should include all Rhone-Poulenc data.
2. Page 10, section 3a. The equation and support info for the Boeing Company calculation of the EP Toxicity value correlation between soil and water should be included as an appendix to the report.
3. The Washington Department of Ecology has recently published a report on Natural Background Soil Metals Concentrations in Washington State, October 1994. This should probably be used and referenced as part of this specific background study for Rhone-Poulenc since it supports the Rhone-Poulenc conclusions.
4. Examples of action levels for the PAHs can be found in Kalama Chemical's final Appendix K for their RFI Report. This appendix was mailed today to Rachel Chang of CH2M Hill's Bellevue office. Action levels for arsenic are readily available. Rhone-Poulenc should verify and document whether levels of both arsenic and PAHs in soils, and their mean-levels in groundwater, fall below action levels. The conclusions should be discussed in the report - possibly under 'Discussions' and/or 'Summary and Conclusion'.